

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
MOUNTAIN EXPRESS OIL COMPANY, et	§	Case No. 23-90147
al. ¹	§	
	§	(Joint Administration Requested)
Debtors.	§	

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF ALL PLEADINGS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for First Horizon Bank, as Administrative Agent ("First Horizon"), pursuant to Rules 2002, 3017, 9007, 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, and orders, or other documents, filed or entered in these cases be transmitted to:

Shari L. Heyen
GREENBERG TRAUIG, LLP
1000 Louisiana, Suite 6700
Houston, Texas 77002
Telephone: (713) 374-3500
Facsimile: (713) 374-3505
Email: *Shari.Heyen@gtlaw.com*

John D. Elrod
GREENBERG TRAUIG, LLP
Terminus 200
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone: (678) 553-2100
Email: *ElrodJ@gtlaw.com*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at www.kcellc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company's principal place of business and the Debtors' service address in these chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and Title 11 of the United States Code, but also includes without limitation the schedules, statement of financial affairs, operating reports, pleadings, motions, applications, complaints, demands, hearings, requests or pleadings, and disclosure statement, any letter, objections, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed or delivered to the clerk, Court or judge in connection with and with regard to these cases and any proceeding related thereto as well as the property of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of First Horizon to (a) have final orders in non-core matters entered only after *de novo* review by a District Court judge, (b) trial by jury in a proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (d) object to the jurisdiction of the Bankruptcy Court for any purpose, (e) any election of remedy, or (f) any rights, claims, actions and/or defenses, in law, in equity, or otherwise, all of which such rights, claims, actions and/or defenses, are expressly preserved and reserved.

(Signature page follows.)

Dated March 18, 2023.

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen
Shari L. Heyen
Shari.Heyen@gtlaw.com
Texas State Bar No. 09564750
1000 Louisiana Street, Suite 6700
Houston, Texas 77002
Telephone: (713) 374-3535
Facsimile: (713) 374-3505

and

John D. Elrod
Pro Hac Vice application forthcoming
ElrodJ@gtlaw.com
Terminus 200
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone: (678) 553-2100

Counsel for First Horizon Bank, as Administrative Agent

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Notice of Appearance and Request for Service of All Pleadings* was served on March 18, 2023, by electronic mail at the time of filing via the CM/ECF system which sends notification of such filings to those parties receiving electronic notification.

/s/ Shari L. Heyen
Shari L. Heyen